

**UNITED STATES BANKRUPTCY COURT  
MIDDLE DISTRICT OF PENNSYLVANIA**

**In re:** Debtor(s) name(s) used by the debtor(s) in the last 8 years, including married, maiden, and trade):

Jeffrey M. Garber  
**Debtor 1**

Nationstar Mortgage, LLC  
**Movant(s)**

v.

Jeffrey M. Garber

**Respondent(s)**

Jack N. Zaharopoulos, Esquire  
Standing Chapter 13 Trustee

**Additional Respondent**

**Chapter 13**

**Case No.** 1:23-BK-00249-HWV

**Matter:** Motion for Relief from the Automatic Stay

**Document No.** 31

**DEBTOR(S)' ANSWER TO MOVANT(S)' MOTION  
FOR RELIEF FROM THE AUTOMATIC STAY**

AND NOW, come the Debtor(s), Jeffrey M. Garber, through their attorney, Paul D. Murphy-Ahles, Esquire and DETHLEFS PYKOSH & MURPHY, who files the within Debtor(s)' Answer to Movant(s)' Motion for Relief from the Automatic Stay and aver as follows:

1. Admitted.

2. Admitted.

3. Admitted.

4. Paragraph 4 contains a conclusion of law to which no response is required.

5. Admitted.

6. Admitted. By way of further response, as indicated in the Original Plan, Debtor(s) intent to list the property on the open market for sale as there is equity in the property to pay Movant(s) in full and provide for distribution to allowed and timely filed proof of claims. Further, relief from the stay and foreclosure of the property will be detrimental to creditors in this case as the proceeds from the sale can be distributed.

7. Admitted.

8. Paragraph 8 contains a conclusion of law to which no response is required.

9. Paragraph 9 contains a conclusion of law to which no response is required.

10. Admitted.

11. Paragraph 11 contains a conclusion of law to which no response is required.

12. Paragraph 12 contains a conclusion of law to which no response is required.

WHEREFORE, Debtor(s) requests this Court deny the requested relief.

Respectfully submitted,  
**DETHLEFS PYKOSH & MURPHY**

Date: May 12, 2023

/s/ Paul D. Murphy-Ahles

Paul D. Murphy-Ahles, Esquire  
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Camp Hill, PA 17011  
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*Attorney for Debtor(s)*

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**CERTIFICATE OF SERVICE**

I hereby certify that on Friday, May 12, 2023, I served a true and correct copy of the **Debtor(s)' Answer to Movant(s)' Motion for Relief from the Automatic Stay** in this proceeding via electronic means upon the following:

Adam Hall, Esquire  
Manley Deas Kochalski, LLC  
PO Box 165028  
Columbus, OH 43216-5028  
*Counsel for Movant(s)*

Jack H. Zaharopoulos, Esquire  
Standing Chapter 13 Trustee  
8125 Adams Drive, Suite A  
Hummelstown, PA 17036

Office of the United States Trustee  
Sylvia H. Rambo US Courthouse  
1501 North Sixth Street, 3<sup>rd</sup> Floor  
Harrisburg, PA 17102

/s/ Kathryn S. Greene

Kathryn S. Greene, RP®, Pa.C.P.  
Paralegal for Paul D. Murphy-Ahles, Esquire